

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

LEAGUE OF UNITED LATIN AMERICAN
CITIZENS, *et al.*,

Plaintiffs,

v.

GREG ABBOTT, in his official capacity as
Governor of the State of Texas, *et al.*,

Defendants.

CIVIL ACTION NO.
3:21-cv-00259-DCG-JES-JVB
[Consolidated Action: Lead Case]

**OPPOSED JOINT MOTION OF PLAINTIFFS LULAC, ET AL. ABUABARA ET AL.,
AND TEXAS NAACP FOR LEAVE TO EXCEED PAGE LIMIT FOR THEIR MOTION
TO COMPEL PRODUCTION OF DOCUMENTS FROM DEFENDANT ABBOTT**

Pursuant to Local Rule CV-7(C)(3), LULAC Plaintiffs, Abuabara Plaintiffs, and Plaintiff Texas NAACP (“Plaintiffs”) move for leave to file a brief in excess of ten (10) pages—for up to twenty-five (25) pages—in support of their forthcoming joint motion to compel production of documents from Defendant Abbott. A proposed order is attached hereto, along with Plaintiffs’ proposed motion and related exhibits.

Plaintiffs seek leave to exceed the page limit in order to explain the factual and legal bases of their request, given the myriad privilege issues raised by Abbott’s privilege log. Those issues include the scope and applicability of the legislative privilege, Texas Government Code § 323.017, deliberative-process privilege, attorney-client privilege, and work product doctrine. Granting this motion will not prejudice any party, especially in light of the consolidated nature of Plaintiffs’

proposed motion, which spares Defendants from responding to three sets of briefing on the instant dispute.

CONCLUSION

For the foregoing reasons, Plaintiffs respectfully request that the Court grant this motion.

DATED: June 27, 2022

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CERTIFICATE OF CONFERENCE

I hereby certify that, on June 22, 2022, counsel for Plaintiffs emailed counsel for Defendants regarding the instant motion and Plaintiffs' joint motion to compel. On June 23, 2022, counsel for Defendants responded to Plaintiffs regarding their joint motion to compel, but did not state whether they opposed the instant motion. That same day, counsel for Plaintiffs again emailed counsel for Defendants' to determine their position on the instant motion. On June 24, 2022, counsel for Defendants responded and stated that they oppose Plaintiffs' motion.

/s/ Nina Perales
Nina Perales

CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that she has electronically submitted a true and correct copy of the above and foregoing via the Court's electronic filing system on the 27th day of June 2022.

/s/ Nina Perales
Nina Perales